Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	**)**	
IN RE: DELETE, DELETE, DELETE	**)**	
	)	**GN Docket No. 25-133**
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Comments of Ria Jairam, N2RJ

My name is Ria Jairam, and I have been a licensed amateur radio operator for 27 years, 24 of those in the United States. I hold amateur radio callsign N2RJ and GMRS callsign WRNY816. I have held leadership positions in various national amateur radio organizations and I am currently on the board of Amateur Radio Digital Communications (ARDC). However, these views expressed in these comments are entirely my own and do not represent those of Amateur Radio Digital Communications (ARDC) or any other entity.

Background of the amateur service, regulatory history and why change is needed.

The amateur service is as old as radio technology itself, since many of the early inventors of radio technology were themselves learning and experimenting.

The FCC rules in 47 CFR 97.1 state that the amateur radio service's basis and purpose is as follows:

(a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.

(b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

(c) Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art.

(d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

(e) Continuation and extension of the amateur's unique ability to enhance international goodwill.

Early radio regulations were crafted in response to real problems with interference. The sinking of the Titanic in 1912, along with radio interference that hampered rescue efforts was the turning point that spurred radio regulations to require licensing and spectrum allocation. Regarding current regulations, the FCC has strayed far from this original purpose. Some of the rules that have accumulated over the years have resulted in extreme micromanagement of the airwaves, and in particular the amateur radio service. Additionally, our regulations have not kept pace with advances in technology and the needs of licensees. This has hampered our ability to advance our skills, contribute to the advancement of the radio art and provide emergency communications and other voluntary services.

Point one – amateur radio frequency bands are micromanaged and lack freedom of usage

The United States is one of a few countries that manages amateur radio allocations down to the types of emissions permitted on portions of each amateur radio band. Specifically, in 97.305, the current rules divide up each amateur radio band into smaller portions and only allow certain types of emissions on each portion. Very few other countries do this, and this sometimes results in the inability to communicate with radio amateurs operating in other countries. Additionally, morse code telegraphy (mode designation A1A) is allowed in nearly every portion of every

amateur radio band. Morse Code Telegraphy, while it remains important and relevant to amateur radio, has largely been superseded in other radio services.

Additionally, advanced data emissions, spread spectrum and other newer technologies are severely restricted in their usage across all amateur radio bands, particularly the High Frequency or HF bands below 30MHz. Automatically controlled stations such as digital beacons are severely restricted due to rules such as in 97.203.

The current rules do not serve a useful purpose other than to keep status quo in the amateur radio service.

Removing some of these burdensome rules would give amateur radio licensees the freedom to experiment, try new modes of operation and activities and enable more communication with other licensees across the world. I would like to propose that the regulations regarding amateur radio spectrum be simplified as follows:

Delete 97.305, 97.309 and 97.311 in its entirety. Replace it with a simple rule that allows any emission type on any amateur radio band. This would give licensees the freedom to use the emission types necessary to carry out the desired communications. Community consensus such as voluntary band plans can be used to segment traffic but allow rapid adjustment if and when needs change.

Modify 97.307 as follows:

Delete 97.307(f)(1), (3),(5),(6),(7),(8),(9),(10),(11),(13).

There are concerns about excessive bandwidth emissions if the Commission does not micromanage the amateur bands.

However, 97.307(a) states that: "No amateur station transmission shall occupy more bandwidth than necessary for the information rate and emission type being transmitted, in accordance with good amateur practice."

I believe that this regulation is sufficient for the purposes of avoiding excessively wide bandwidth emissions in the amateur radio service.

Point two – amateur radio licensing is too complex and should be restructured

The current license structure of three active license classes (Technician, General and Amateur Extra) and two grandfathered classes (Novice and Advanced) is the result of years of restructuring and shoehorning of outdated licensing schemes developed in the early 20th century. Updates were made during the cold war and at the beginning of the 21st Century but in many cases have not kept pace with the current reality of licensing.

Our license structure uses an outdated method of segmenting the High Frequency (HF) bands instead of going by power levels as many other countries have now adopted. We also have to be mindful of international regulations like CEPT T/R 61-01 which recognize on the Advanced and Amateur Extra class licenses as full licenses.

I would propose that the Commission keep the current license classes defined in 97.9(a). However, the license privileges should be restructured as follows:

Novice (grandfathered): All amateur radio bands, maximum power 10 watts PEP.

Technician Class: All amateur radio bands, maximum power 200 watts PEP.

General Class: All amateur radio bands, maximum power 1500 watts PEP.

Advanced Class (grandfathered): Same privileges as General, but remains as a knowledge endorsement and for reciprocal purposes.

Amateur Extra Class: Same privileges as General, but remains as a knowledge endorsement and for reciprocal purposes, particularly under CEPT and IARP.

Additionally, the Commission should modify 97.9 so that an equivalent foreign qualification such as the Harmonized Amateur Radio Examination Certificate (HAREC) which is used by the European Union and other countries be also recognized as an acceptable qualification to obtain a General class amateur radio license.

Point three – allow radio amateurs to redact their personal information from public view

Currently, licensees' name and address history are visible to the public and associated with their callsign. Data brokers have made this data available to the public. I would like to propose that the licensee be given the option to make their data private and not publicly visible. Other agencies such as the FAA currently allow this for their respective licensees. This will enhance licensee privacy and help prevent identity theft and criminal harassment. I would propose that 97.23 be amended to allow the use of an alternate address for public view.

Point four – allow freedom of equipment design

I would like to propose deleting the following rules:

97.315 and 97.317 should be deleted in their entirely. It is an outdated regulation which stems from the fear of CB radio operators repurposing amateur radio amplifiers to use on CB radio. In

reality, this rule does little to stop CB radio operators from using amplifiers but does hamper the use of newer, higher gain amplifier technologies such as LDMOS solid state devices.

Conclusion

These rule deletions and amendments will remove unnecessary burdens and bring the amateur radio service back to its true basis and purpose.

Respectfully Submitted

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